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Before the

**FEDERAL COMMUNICATIONS COMMISSION**

FILED

Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of the Amateur Service )  
 )  
Rules to Implement a Vanity Call )  
 )  
Sign System )  
\_\_\_\_\_ )

PR Docket 93-305

To the Commission:

**REPLY COMMENTS  
of HERBERT C. HOLEMAN  
Amateur Radio Licensee WL7BIL\***

This proceeding is important to many amateur operators because their FCC assigned callsigns are probably more significant than their names, when used on-the-air. The Commission is to be commended for its responsiveness to the wishes of the amateur community in going forward with this docket during a time of increased workload and dwindling funds. As an active amateur radio enthusiast for nearly 40 years, I intend to apply for a "preferred" callsign as soon<sup>as</sup> possible after this proceeding is implemented, and will willingly pay the fee the Commission has proposed.

1. What is a Preferred Callsign? In general, amateurs tend to think of older callsigns as more desirable than newer ones. Callsigns issued by the Commission a long time ago have a different format from those issued today, thus an amateur station

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callsign can be an instant indicator of how long ago its holder was first licensed. It follows that callsigns of the one by 2 format such as W1AW suggest that the holder was licensed in the 1920's, while one by three format callsigns such as W6TSQ were issued up to about the 1950's. Conversely, one by three callsigns beginning with the letter "N" are not as desirable because amateurs know that they have only been issued since about 1980.

2. Important issue not addressed in the NPRM. After a careful reading of the NPRM, I was unable to ascertain precisely which callsign groups would be available for assignment to the various classes of amateur stations if the proposed rules were adopted as written. Not clear from the NPRM was whether callsigns of the format W7AA, W7AAA, K7AA, and K7AAA -- so-called one by two and one by three callsigns (but excluding "N" prefixes) -- would be available for reissue. These callsigns were assigned to all Technician Class and higher amateur stations up to about the 1960's when their supply was exhausted, but have not been assigned by the Commission since that time. A huge number of amateur operators would like to see vacant callsigns of this format reissued (recycled) as "preferred" or "vanity" callsigns. The NPRM says only that an amateur could apply for a preferred callsign from his assigned group or from a lower group. The Commission needs to clarify whether the above listed highly desirable callsign groups will be available. I'm sure that I speak for most of the amateur community in asking that callsigns of this format be identified as "preferred", and further that they be available for assignment, if vacant, after the rulemaking is completed. Since

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the interest in obtaining a callsign of this format will be very high, I further suggest that one by two and one by three callsigns be available only to Extra Class licensees, at least during the early stages of the program. I also agree with the American Radio Relay League (ARRL) that one by one callsigns (i.e. W5A) should be reserved for special event stations.

3. Which Licensees should participate in the Vanity Callsign Program? The NPRM and the ARRL, of which I am a member, have suggested that all licensed amateurs be eligible for participation in the program, and I support this suggestion, as long as appropriate filing windows are in place. More about filing windows later.

4. Fees. No amateur needs a preferred callsign. For this reason, I would like to maintain the status quo of no fee for regular amateur license processing by the Commission. But for "preferred" callsigns, the proposed fee is nominal and I will cheerfully pay a \$70 fee for a ten year license; indeed I would pay even if the fee were double that amount, which would probably come closer to paying for the Commission's actual costs and might result in faster service. I disagree with the ARRL's position that an amateur should not have to pay an additional fee at renewal. The proposed fee is for a "premium" service from the Commission--a preferred callsign--and if a licensee is unwilling to pay the fee upon renewal, his callsign should lapse into the pool and be available for assignment to someone else. If the Commission comes out ahead on fees for renewals, I'd be happy to see these funds used to reduce the processing backlog for routine amateur license processing. Stated again, a preferred callsign is a "vanity" item,

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not a basic service, and I have no objection to paying a fee for that privilege.

5. Phase-in periods and priorities. I feel confident that the preferred callsign program will be very popular with many amateurs, and that if no orderly process is developed the Commission could be swamped with 50,000 applications in Gettysburg on the day the new ruling goes into effect, if the language in the NPRM is not modified. The ARRL has proposed a series of filing windows whereby amateur operators who fall into certain categories may apply for a "preferred" callsign, and I strongly support a phase-in period with filing windows.

The ARRL has proposed that the first window of opportunity to apply for a preferred callsign be extended to a number of categories. I am in agreement with ARRL that the first window should go to those individuals or clubs who are applying for a callsign which they have previously held, but have lost for whatever reason. An early filing window is needed for these persons to regain a callsign previously held before it is awarded to other applicants. I further suggest that this window be available to any individual applicant regardless of their operator license class. A useful safeguard would be to ask those applicants to affirm in their application that they have previously held the callsign for which they are making application.

ARRL would include in its proposed first filing window individuals who wish to apply for the callsign held by a deceased relative, and goes on to say that family members should have the first opportunity to apply for the callsign of a deceased relative. This position is certainly a "politically correct" one for ARRL to take, but

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would pose great difficulties for the Commission to administer and cause long delays in processing and verifying the necessary documentation needed to verify family status, callsign held, by whom, etc. The Commission needs to make sure that the filing windows are kept simple and that processing will move forward at a rapid pace. For these reasons, I oppose the ARRL position on early filing windows for relatives of deceased amateurs.

ARRL proposes that the subsequent filing windows be based on license class, and I wholeheartedly concur with that position. Incentive licensing is a long established tradition in amateur radio, and the opportunity to apply for a preferred callsign will serve as an appropriate reward for those who have completed the higher license grades, and will also provide a strong incentive for others to upgrade.

**6. Club Station Participation.** Other than permitting club stations to apply for a callsign held prior to the 1978 rules changes, I would like to see individual applicants have priority over club applicants in any filing window opportunities. Under the present or even under the proposed new rules for club station licenses, it would still be possible for a very few amateurs to form a "paper" club and apply for a preferred callsign, which could then be appropriated by the trustee for his exclusive use. I would prefer to see all individual applicants have access to the vanity callsign program, then after all the filing windows have gone into effect the program could be opened for clubs and for second station licenses for individuals.

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7. **Out of Area Callsign Issuance:** Most of the amateur community would prefer to continue the tradition of issuing callsigns in accordance with the districts zero through nine, based upon the station location. Current Commission practice since about 1980 is to issue a callsign prefix based upon the applicant's mailing address. This relatively recent change led to some abuses during the 1980's when desirable two by one callsigns ran out early in the sixth call area, California. Two by one callsigns were still available in the seventh call area, so some amateurs applied for callsigns in their group but listed a Nevada mailing address in their application. This process of "raiding" desirable callsigns was also practiced by listing mailing addresses in Alaska, Hawaii, and other U.S. possessions.

The Commission could make a simple change that would largely solve this problem and prevent abuse. Callsign assignment should be based on the actual station location or residence address, as was Commission practice before the 1980 changes. I urge the Commission to consider returning to its former practice for all amateur license assignments, but especially for the awarding of preferred callsigns under the NPRM.

I agree with the ARRL position that something needs to be done to prevent depletion of the callsign pool in Alaska, Hawaii, and U.S. possessions. Basing the preferred callsign prefix on the applicant's residence address--the actual station location--and to have the applicant affirm that he is a resident in that location would largely solve this problem. It would also be desirable to curtail the widespread practice of "transferring" an Alaska, Hawaii, Puerto Rico, etc. callsign to a stateside mailing address,

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as is permitted under current Commission rules and practice. This problem is widespread: In a listing of highly coveted KL7x and WL7x two by one callsigns, over half of the holders showed addresses in the mainland contiguous 48 states. The Commission should consider returning to its past policy of issuing a new callsign which would reflect the appropriate geographic area of an applicant who moves his station or residence from Alaska, Hawaii, or a U.S. possession to the mainland contiguous 48 states.

Another action the Commission could take to ease the problem of callsign availability in Alaska and some of the other possessions would be to immediately cease issuance of the highly desirable two by two format callsigns (i.e. WL7AA) to technician class licensees and to reserve these callsigns for the preferred callsign program when it is implemented. I encourage the Commission to do this as soon as possible, since they will be exhausted soon.

**Conclusions and recommendations:** The preferred or "Vanity" callsign program is a welcome step toward better serving the amateur community. The Commission can expect a high interest from amateurs followed by a large number of applications and an increase in the Commission's workload. The proposed fee structure is reasonable and fair. The Commission should make known in its Report and Order if highly desirable one by two and one by three callsigns will be recycled, as I hope they will. Particular attention needs to be paid to fairness in the application process for preferred callsigns, namely in the choice of filing windows and in the area of club station licenses. I have

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included some suggestions for dealing with these issues in my comments. Peripheral issues involving callsigns for offshore states and U.S. possessions are important to those of us who live in these places.

Thank you for considering these comments.

DATED at Juneau, Alaska this 19th day of May, 1994.

A handwritten signature in cursive script, reading "Herbert C. Holeman", written in dark ink. The signature is positioned above a solid horizontal line.

**Herbert C. Holeman**

**Amateur Radio Extra Class Licensee**

**Station License WL7BIL**